

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiffs,

vs.

NADIM AHMED a/k/a NADIM KHAN,
MEHREEN SHAH a/k/a MONA SHAH,
NURIDE TRANSPORTATION GROUP,
LLC, NYC GREEN TRANSPORTATION
GROUP, LLC, MED TRANS EB-5 FUND,
LLC, NYC EV MOBILITY LLC,
GRAVITAS NYC REGIONAL CENTER,
LLC f/k/a NYC TRANSPORTATION
REGIONAL CENTER, LLC, and MONA
SHAH & ASSOCIATES, PLLC,

Defendants.

CIVIL ACTION No. 23-cv-10210

THE SHAH DEFENDANTS' NOTICE OF MOTION TO DISMISS THE COMPLAINT

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law, dated January 22, 2024, and upon all pleadings and proceedings in this action, Defendants Mona (a/k/a Mehreen) Shah, Mona Shah & Associates, PLLC, Gravitas NYC Regional Center, LLC (a/k/a NYC Transportation Regional Center, LLC), and Med Trans EB-5 Fund, LLC (collectively, the “Shah Defendants”) shall move this Court before the Honorable Vernon S. Broderick, U.S.D.J., at the United States District Court for the Southern District of New York located at 40 Foley Square, New York, New York 10007, at a date and time to be determined by the Court, for an Order pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, granting the Shah Defendants’ Motion to Dismiss the Complaint in its entirety with prejudice, or, alternatively, for

an order limiting the Complaint to include only investments made within the applicable statute of limitations period, and for such other, further, or different relief as the Court deems just and proper.

Dated: New York, New York
January 22, 2024

Respectfully submitted,

McGuireWoods LLP

/s/ Aaron F. Jaroff

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Attorneys for Defendants Mona Shah, Mona Shah & Associates, PLLC, Gravitas NYC Regional Center, LLC, and Med Trans EB-5 Fund, LLC

To: All counsel of record (VIA ECF)